

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. _____

**18 U.S.C. § 1028(f)
18 U.S.C. § 1028(a)(1)
18 U.S.C. § 2**

UNITED STATES OF AMERICA

vs.

**MARCO ANTONIO LOPEZ,
MARIA CONSUELO ARBOLEDA,
and
MAURICIO OCHOA,**

Defendants.

_____ /

INDICTMENT

The Grand Jury charges that:

COUNT 1

1. From in or around October 2005, the exact date being unknown to the Grand Jury, and continuing through on or about March 8, 2006, at Broward County, in the Southern District of Florida, and elsewhere, the defendants,

**MARCO ANTONIO LOPEZ,
MARIA CONSUELO ARBOLEDA,
and
MAURICIO OCHOA,**

did knowingly and willfully combine, conspire, confederate, and agree with each other and other persons known and unknown to the Grand Jury to commit an offense against the United States, that

is, to produce identification documents, in and affecting interstate commerce, without lawful authority, in violation of Title 18, United States Code, Sections 1028(a)(1).

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its object, at least one of the co-conspirators committed or caused to be committed, in the Southern District of Florida, and elsewhere, at least one of the following overt acts, among others:

1. In or about November, 2005, in Broward County, Florida, defendant **MAURICIO OCHOA** took receipt of approximately \$4000 in cash from defendant **MARIA CONSUELO ARBOLEDA** as payment for fraudulently producing Florida driver's licenses on behalf of W.M.G. and W.G.

2. On or about January 23, 2006, in Broward County, Florida, defendant **MARCO ANTONIO LOPEZ** paid a cooperating individual approximately \$800 in cash as payment for fraudulently producing Florida driver's licenses on behalf of J.C., M.L., and J.C.

3. On or about January 30, 2006, in Broward County, Florida, defendant **MARCO ANTONIO LOPEZ** paid a cooperating individual approximately \$600 in cash as payment for fraudulently renewing the Florida driver's license of J.S.

4. On or about February 1, 2006, in Broward County, Florida, defendant **MARIA CONSUELO ARBOLEDA** paid a cooperating individual approximately \$1000 in cash as payment for fraudulently renewing the Florida driver's license of G.P.

5. On or about February 13, 2006, in Broward County, Florida, defendant **MARCO ANTONIO LOPEZ** paid a cooperating individual approximately \$2000 in cash as payment for fraudulently renewing Florida driver's licenses on behalf of R.T., A.C., C.A., and R.Z.

6. On or about February 13, 2006, in Broward County, Florida, defendant **MARIA CONSUELO ARBOLEDA** paid a cooperating individual approximately \$1000 in cash as payment for fraudulently renewing the Florida driver's license of B.G.

7. On or about March 8, 2006, in Broward County, Florida, defendant **MARCO ANTONIO LOPEZ** directed a cooperating individual to fraudulently produce Florida driver's licenses on behalf of E.V., J.R., and L.M. in return for approximately \$1500 in cash.

All in violation of Title 18, United States Code, Section 1028(f).

COUNT 2

On or about January 23, 2006, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

MARCO ANTONIO LOPEZ,

did knowingly and without lawful authority, produce an identification document, that is, a State of Florida driver's license, on behalf of J.C., in and affecting interstate commerce, in violation of Title 18, United States Code, Sections 1028(a)(1) and 2.

COUNT 3

On or about January 23, 2006, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

MARCO ANTONIO LOPEZ,

did knowingly and without lawful authority, produce an identification document, that is, a State of Florida driver's license, on behalf of M.L., in and affecting interstate commerce, in violation of Title 18, United States Code, Sections 1028(a)(1) and 2.

COUNT 4

On or about February 1, 2006, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

MARIA CONSUELO ARBOLEDA,

did knowingly and without lawful authority, produce an identification document, that is, a State of Florida driver's license, on behalf of G.P., in and affecting interstate commerce, in violation of Title 18, United States Code, Sections 1028(a)(1) and 2.

COUNT 5

On or about February 13, 2006, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

MARCO ANTONIO LOPEZ,

did knowingly and without lawful authority, produce an identification document, that is, a State of Florida driver's license, on behalf of R.T., in and affecting interstate commerce, in violation of Title 18, United States Code, Sections 1028(a)(1) and 2.

COUNT 6

On or about February 13, 2006, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

MARIA CONSUELO ARBOLEDA,

did knowingly and without lawful authority, produce an identification document, that is, a State of

Florida driver's license, on behalf of B.G., in and affecting interstate commerce, in violation of Title 18, United States Code, Sections 1028(a)(1) and 2.

A TRUE BILL

FOREPERSON

Kent H. No. 4
R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY

Christopher J. Clark
CHRISTOPHER J. CLARK
ASSISTANT UNITED STATES ATTORNEY